

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America,

Plaintiff,

v.

Herbert T. Felton, Jr.

Case: 4:14-mj-30265
Assigned To : Hluchaniuk, Michael J.
Assign. Date : 6/5/2014
Description: CMP USA v HERBERT
T. FELTON, JR. (TH)

Defendant(s).

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief:

On or about the date(s) of May 7, 2014 to May 9, 2014, in the county of Genesee
in the Eastern District of Michigan, the defendant(s) violated:

Code Section

Title 18, United States Code, Section 2423(a)

Offense Description

Transportation of minors with intent to engage in criminal sexual
activity

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.


Complainant's signature

India Rochelle Jones

Printed name and title

Sworn to before me and signed in my presence.

Date: 6-5-2014


Judge's signature

City and state: Flint, Michigan

Michael Hluchaniuk, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT OF INDIA JONES IN SUPPORT OF
CRIMINAL COMPLAINT – *U.S. v. Felton*

I, India Jones, being sworn, depose and state the following:

1. I am employed as a Special Agent (SA) with the Federal Bureau of Investigation. I have been so employed since April 2011. I am currently working with local law enforcement officers on the investigation of Herbert T. Felton, Jr., for, among other things, violations of 18 U.S.C. § 2423(a).

2. On May 7, 2014, PW, a 14 year old living in Tilton, Illinois was reported missing. PW was seen earlier in the day walking to school however he did not actually enter the school building. Video from the Dansville, Illinois bus station shows that PW boarded a bus sometime after 11:45 am.

3. PW's father obtained PW's cellular phone records and noted an unfamiliar number with an out-of-state 810 area code. PW's father travelled to Michigan and met with Det. Mark Holland on May 8, 2014. Det. Holland was able to trace the telephone number to Felton. Officers also learned that Felton was using the address 313 Page Street, Flint, Michigan. Sometime on or around midnight officers went to 313 Page Street and found PW and Felton at the residence. At the time that officers arrived, PW was visibly intoxicated.

4. Felton was arrested and advised of his Miranda rights. He waived his rights and consented to an interview with officers of the Genesee County Sheriff's Department. Felton said he met PW over the internet approximately one year ago. Since that time they had communicated via internet social media and cell phone. Felton said that communication between he and PW included transmitting sexually explicit pictures to each other. Recovered off Felton's cell phone were several images of PW naked.

5. Felton further stated that he travelled to Illinois to meet PW on or around May 7, 2014. PW and Felton travelled via bus from Dansville to

Champagne, Illinois. In Champagne PW and Felton boarded the Amtrack Train and continued to Flint, Michigan. Det. Holland has confirmed via video surveillance at the various bus and train stations the information provided by defendant regarding the travel to Michigan. Also recovered from defendant's bedroom were the Amtrack train tickets purchased by Felton.

6. Felton stated that while in Michigan he and PW engaged in sexual intercourse. Felton first indicated that he believed PW was over 18 years of age but ultimately indicated that he knew he was under 16 years old. On Felton's cell phone was a photo image of PW's school identification with his date of birth showing his age as 14 years old.

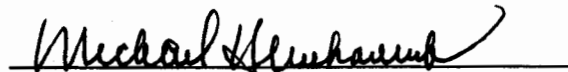
7. Based on discussions with Det. Holland and other law enforcement officers involved in this investigation it would appear that PW and Felton had had an intimate relationship for a significant period of time. By way of example, Felton indicated that he and PW were to get married, Felton engaged in "grooming" techniques including sharing of sexually explicit photos with PW, and the chat rooms PW and Felton communicated in were rooms associated with sexual encounters, i.e. "naughtymeetings.com".

8. I have reviewed the Michigan laws and after discussions with the Genesee County Prosecutor's Office, the sexual activity between Felton and PW is a criminal offense under MCLA §§750.520b and 750.520d.


India Rochelle Jones
Complainant

Sworn to before me and signed in my presence.

Date: 6-5-2014


Michael Hluchaniuk
United States Magistrate Judge